

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DAVID MAZZA,)
)
)
 Plaintiff,)
)
 v.)
)
VERIZON SICKNESS AND ACCIDENT) Civil Act. No. 04-30020-MAP
DISABILITY BENEFIT PLAN FOR)
NEW ENGLAND ASSOCIATES, *et al.*,)
)
 Defendants.)
)
)

**JOINT MOTION FOR EXTENSION
OF SUMMARY JUDGMENT MOTION DEADLINES**

Plaintiff David Mazza and defendants Verizon Sickness and Accident Disability Benefit Plan for New England Associates (the “Plan”) and Verizon Communications Inc. (“Verizon”), jointly request that all summary judgment motion deadlines, as set forth in the Court’s Order dated November 22, 2004, be extended by fourteen (14) days. In support of this motion, the parties state the following:

1. Plaintiff commenced this action pursuant to the Employee Retirement Income Security Act (“ERISA”) seeking short-term disability benefits denied to him under the Plan.
2. Pursuant to the Court’s Order Regulating Proceedings (Judicial Review of Out-of-Court Nongovernmental Decisions) dated November 22, 2004, the following schedule was set with respect to summary judgment motions: (1) defendants shall file their motion for summary judgment by March 17, 2005; (2) plaintiff shall file his opposition and cross-motion for summary judgment by April 7, 2005; and (3) defendants shall respond to plaintiff’s submission by April 21, 2005.

3. Counsel for plaintiff and counsel for defendants are heavily involved with other litigation matters currently and, as such, the parties believe that an additional fourteen (14) day extension of all summary judgment motion deadlines would allow them to adequately brief all relevant issues in this action.
4. This is the parties' first request for an extension.

WHEREFORE, the parties respectfully move this Court for entry of an Order providing for the following briefing schedule with respect to motions for summary judgment:

Defendants' Motions for Summary Judgment Due	Mar. 31, 2005
Plaintiff's Opposition and Cross-Motion for Summary Judgment Due	Apr. 21, 2005
Defendants' Response to Plaintiff's Opposition and Cross-Motion for Summary Judgment Due	May 5, 2005

Dated: March 15, 2005

Respectfully submitted,

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Benefit Plan for New England
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Communications Inc.

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ORDER

Having considered the parties' Joint Motion for Extension of Summary Judgment Motion Deadlines, it is hereby

ORDERED, that the motion is GRANTED and that

- (1) The defendants shall file their motion for summary judgment on or before March 31, 2005;
- (2) The plaintiff shall file his opposition and cross-motion for summary judgment by April 21, 2005; and
- (3) The defendants shall respond to plaintiff's opposition and cross-motion for summary judgment by May 5, 2005.

Dated _____